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OF COUNSEL
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April 8, 2010

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BY ECF

Honorable Freda L. Wolfson
United States District Court
Clarkson S. Fisher Federal
Building and Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *In re: Verizon Wireless Data Charges Litigation*, Civil Action No. 3:10-cv-01749-FLW-TJB;
Moore v. Cellco Partnership, et al., Civil Action No. 3:09-cv-04592-FLW-TJB;
Heaton v. Cellco Partnership d/b/a Verizon Wireless et al., Civil Action No. 3:09-CV-06270-FLW-TJB

Dear Judge Wolfson:

Together with our co-counsel Foley Bezek Behle & Curtis, LLP, Arias Ozzello & Gignac LLP, Murdock Goldenberg Schneider & Groh, LPA, Minnillo & Jenkins, Co., Bolognese & Associates, LLC and Kaplan Fox & Kilsheimer, LLP, this firm represents the plaintiffs in the above-captioned District of New Jersey consolidated actions (*Moore v. Cellco* and *Heaton v. Cellco*). I write in my capacity as plaintiffs' Interim Liaison Class Counsel pursuant to Your Honor's Order of February 8, 2010 to provide Your Honor with a status report concerning the above-captioned actions.

On April 2, 2010, the Judicial Panel on Multidistrict Litigation ("JPML") entered an order transferring one related action from the Northern District of Georgia to this Court, and referencing fifteen potential tag-along

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actions pending in ten federal districts that likely will be transferred to this Court, for coordinated or consolidated pre-trial proceedings with the Moore and Heaton actions already pending in this District. The JPML Order was filed in the District of New Jersey yesterday and a new docket number assigned: *In Re: Verizon Wireless Data Charges Litigation*, Civil Action No. 3:10-cv-01749-FLW-TJB.

Interim Co-Lead Class Counsel appointed by the Court's February 8th Order have been in contact with Dan Marmalefsky, counsel for defendant Cellco Partnership, in an effort to agree upon a comprehensive proposal to be submitted for Your Honor's guidance and consideration with regard to the efficient management of the issues presented in this case. Interim Co-Lead Class Counsel hope to submit such a proposal to the Court shortly after the effective date of the JPML order transferring the tag-along actions to Your Honor.

Interim Co-Lead Class Counsel also have been in contact with counsel for plaintiffs in the tag-along actions that are the subject of the JPML's transfer order in order to gather the information necessary to determine the scope of a consolidated amended complaint that we would expect to file once all related and tag-along actions have been formally transferred to this Court by the Clerks of the originating Courts.

We stand ready to assist the Court in expediting communication with the plaintiffs and their counsel in the various tag-along actions that will be transferred to this Court.

Respectfully yours



Stephen L. Dreyfuss
Interim Liaison Class Counsel

cc: Dan Marmalefsky, Esq.
Todd L. Schleifstein, Esq.
Peter J. Bezek, Esq.
J. Paul Gignac, Esq.

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(all by ECF or email)